

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

INGEBORG EMMA ROSS,

Plaintiff,

v.

AFNI, INC., AT&T MOBILITY, L.L.C.,  
AND OXFORD COLLECTION AGENCY  
INC.

Defendants.

Case Number 2:08-cv-4155

**AFNI, INC.'S AND AT&T MOBILITY, L.L.C.'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE AN ANSWER OR OTHER RESPONSIVE PLEADING  
TO PLAINTIFF'S COMPLAINT PURSUANT TO RULE 6(b)(1)(A) OF THE  
FEDERAL RULES OF CIVIL PROCEDURE**

Comes now AFNI, Inc. ("AFNI") and AT&T Mobility, L.L.C. ("AT&T") and, for its Unopposed Motion for Extension of Time to File an Answer or Other Responsive Pleading to Plaintiff's Complaint Pursuant to Rule 6(b)(1)(A), states as follows:

1. On or about July 3, 2008, plaintiff instituted suit against AFNI, AT&T, and Oxford Collection Agency, Inc., alleging violations of 11 U.S.C. §524(a) and The Fair Debt Collection Practices Act.

2. AFNI and AT&T received Notice of Service of Process on or about July 7, 2008.

3. AT&T's undersigned counsel received the Complaint after business hours on July 21, 2008. At that time, she was advised by her clients to hold off preparing an answer or other responsive pleading as AT&T was attempting to resolve this matter on behalf of AFNI and AT&T.

4. On July 24, 2008, AT&T's undersigned counsel received word that settlement was not imminent and that a responsive pleading needed to be filed by July 28, 2008.

4. Due to other previously scheduled and planned commitments, including but not limited to: (1) meeting with clients and preparing pleadings in Jerry and Carolyn Vochatzer v. Robert H. Hughes and Southwestern Bell Telephone Company, Cause No. 0816-CV-16493, which is pending in the Circuit Court of Jackson County, Missouri, and (2) preparing for an Arbitration in Spanlink Communications, Inc. v. AT&T Data Comm and AT&T Services, Inc., which is pending before the American Arbitration Association, AT&T's counsel does not have sufficient time to investigate the allegations in Plaintiff's Complaint and to meet with her client in order to prepare an Answer or other Responsive Pleading in the above-captioned matter by Monday, July 28, 2008.

5. AT&T's undersigned counsel, therefore, respectfully requests an additional fourteen (14) days, to and including August 11, 2008, to file an Answer, including all appropriate affirmative defenses, or other Responsive Pleading on behalf of AFNI and AT&T.

6. Plaintiff's attorney does not expose this extension.

Wherefore, AFNI and AT&T prays that the Court grant its Unopposed Motion for Extension of Time to File an Answer or Other Responsive Pleading to Plaintiff's Complaint Pursuant to Rule 6(b)(1)(A), together with any further and/or additional relief the Court deems just and proper.

Respectfully submitted,

By: /s/ Mimi B. MacDonald

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Attorney for AFNI, Inc. and AT&T Mobility,  
L.L.C.

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed electronically this 24th day of July, 2008, with the Court to be served by operation of the Court's electronic filing system to the following counsel of record:

Michael W. McCrary  
Debt Relief Law Center of Missouri  
1103 East Walnut, Suite 203  
Columbia, Missouri 65201

/s/ Mimi B. MacDonald